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12 Attorneys for Plaintiff
13 VERIGY US, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 VERIGY US, INC, a Delaware Corporation

18 Plaintiff,

19 vs.

20 ROMI OMAR MAYDER, an individual;
21 WESLEY MAYDER, an individual; SILICON
22 TEST SYSTEMS, INC., a California Corporation;
23 and SILICON TEST SOLUTIONS, LLC, a
24 California Limited Liability Corporation,
25 inclusive,

26 Defendants.

Case No. C07 04330 RMW (HRL)

**PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Howard R. Lloyd
Ctrm: 2

Complaint Filed: August 22, 2007
Trial Date: None Set

1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Plaintiff Verigy U.S., Inc. ("Plaintiff"
2 or "Verigy") requests that the following materials be filed under seal, as they contain confidential
3 information that is protected by the Stipulated Protective Order entered by the Court on August
4 29, 2007. The documents submitted under seal include:

5 1. Portions of Verigy's Notice of Motion and Motion to Compel Amended Response
6 and Responsive Information to Request for Production No. 17 from Romi Mayder and Silicon
7 Test Systems, Inc.; Supporting Memorandum of Points and Authorities in Support (the "MPA");
8 and

9 2. Exhibits D, E, F,G, H, J,K, and L to the Declaration of Melinda M. Morton.

10 These materials (hereafter "the Materials") each disclose information that has been
11 designated as "Highly Confidential—Attorneys' Eyes Only" (portions of the MPA and Exhibits D,
12 E, F, K, and L) or "Confidential" (portions of the MPA and Exhibits G, H, and J) by the parties
13 under the protective order, without objection to those designations (although Verigy reserves its
14 rights to challenge such designations pursuant to the Stipulated Protective Order). Although the
15 information in the Materials has been designated as protected from disclosure under the Protective
16 Order, Verigy relies on this information in support of its Motion to Compel. The parties'
17 confidentiality interest therefore overcomes the right of public access to the record, as a substantial
18 probability exists that the parties' overriding confidentiality interest will be prejudiced if the
19 record is not sealed. Further, the proposed sealing is narrowly tailored and no less restrictive
20 means exist to achieve this overriding interest

21 Pursuant to Local Civil Rule 79-5(b)-(c), Verigy therefore lodges the Materials with this
22 Court, and respectfully requests leave to file the aforementioned documents under seal.

23 Respectfully submitted.

24
25 Dated: October 2, 2007

BERGESON, LLP

26 By: /s/
27 Melinda M. Morton
28 Attorneys for Plaintiff
VERIGY US, INC.